

## REMARKS/ARGUMENTS

These Remarks are in reply to the Office Action mailed September 20, 2007. Claims 1, 4-7, 11, 13, 17, 20-23, 27, 28, and 36-39 were pending in the Application prior to the outstanding Office Action. Claims 11 and 27 are currently being amended. No claims are currently being canceled or added. Accordingly, claims 1, 4-7, 11, 13, 17, 20-23, 27, 28, and 36-39 remain for the Examiner's consideration, with claims 1, 11, 17, and 27 being independent. Reconsideration and withdrawal of the rejections are respectfully requested.

### **I. Claims Rejected under 35 U.S.C. §103(a)**

Claims 1, 4-7, 11, 13, 17, 20-23, 27, 28, and 36-39 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Cloud et al. (U.S. Patent No. 6,253,369, hereinafter Cloud) in view of Kim et al. (U.S. Publication No. 2002/0065701, hereinafter Kim).

### **II. Claim 1**

#### **A. Procedural Part as Required by Claim 1**

Claim 1 further requires that the procedural part *can specify additional steps* that must be completed *after* the procedural part completes before a particular task is considered to have completed. (Spec., p. 18, line 10 through p. 19, line 3). Applicants respectfully submit that this feature is not disclosed in Kim. Applicants were faced with the problem of how to specify steps to be reliably executed with maximum parallelism when some steps depend upon the output of other steps and when it is not knowable in advance which steps must be executed. The steps that must be executed as part of the job may depend upon the job's input data and are not knowable in advance. In order to solve this problem, this feature of claim 1 requires that the procedural part can specify additional steps that must be completed after the procedural part completes but before a task is completed.

In the Office action, Kim is cited for allegedly disclosing these features of claim 1. (paras. 0167 and 0172). Yet the cited portions of Kim do not describe these features. Rather, Kim shows an example of modeling a business process by using a sub-process, and that such processes are combined under parent-child relationships by using the Sub-Process activity. When the workflow in the business process reaches the sub-process activity, it activates the child

process. (para. 0167). After the child process finished its execution, the parent process can start its next activity. (para 0172).

Claim 1 requires that the procedural part can specify additional steps that must be completed after the procedural part completes. Kim, on the other hand, discloses that the parent process activates a child process, but the workflow returns to the parent process after the child process completes. The parent process then continues execution of the workflow, even if only to complete its own execution. This is different than additional steps that must be completed after the procedural part completes, as required by claim 1. In other words, in Kim, the child process must be completed *before* the parent process completes. Thus, Kim does not disclose that the procedural part can specify additional steps that must be completed after the procedural part has completed before a particular task is considered to have completed, as required by claim 1.

#### **B. Declarative Part as Required by Claim 1**

Claim 1 requires that a declarative part schedules a plurality of tasks to be performed. These tasks in the plurality of tasks are part of a batch job to be executed, such that the individual tasks are executed separately, *in parallel*, as claimed. Applicants respectfully submit that this declarative part feature is not disclosed in Kim.

Kim teaches a system and method for automating a process of business decision and workflow. The process disclosed in Kim comprises a couple of activities that are performed *in a logical order* according to a business rule, where the business rules are conditions for completing an activity. (paras. 0040 and 0042). Kim is cited in the Office Action for allegedly disclosing that a declarative part schedules a plurality of tasks to be performed. (paras. 0115 and 0193). Kim discloses that the schedule describes the planning of the activities, and the scheduler manages activities to direct workflow from activity to activity. (para. 0115 and 0193). As discussed above, Kim these activities are performed in a logical order.

Claim 1 defines that the batch job tasks are to be executed separately and in parallel. Kim, on the other hand, discloses that the activities are to be executed in a logical order. However, Kim does not teach or suggest that the logical order of activities can be in parallel. Each discussion involving activities in Kim discusses a serial order. Because Kim does not disclose executing tasks in parallel, scheduling a plurality of tasks to be performed that are part of a batch job is not an issue that needs to be resolved. Thus, the scheduling of activities in a

logical order, as disclosed in Kim, is not the same as scheduling a plurality of tasks to be executed, separately and in parallel, as required by claim 1.

### **C. Claim 1 Conclusion**

As such, Applicants respectfully submit that Kim fails to teach or suggest that the declarative part schedules a plurality of tasks to be performed, and that the procedural part can specify additional steps that must be completed after the procedural part completes before a particular task is considered to have completed, as required by claim 1. For at least these reasons, Applicants respectfully submit that that the embodiment defined in claim 1 is neither anticipated by nor obvious in view of Cloud or Kim, taken alone or in combination, and respectfully request reconsideration of the claim.

### **III. Claim 11**

Independent claim 11 has been amended to more clearly define that the step of making a call to start a session further comprises creating a unique address which identifies the session between the service provider and the remote platform. (Spec., p. 34, lines 13-15). Cloud discloses a work flow debugger that provides online addressability to items within the session control block. (col. 20, lines 37-45). For a session as disclosed in Cloud, a session control block provides storage needed for memory and data management for the entire work flow. (col. 4, lines 22-25). The addressability of a session's items in memory as disclosed in Cloud, however, is not the same as a unique address which identifies a session between the service provider and the remote platform, as required by claim 11. Kim discloses that the workitem application table keeps the file identifier representing the address of each workitem application's data in order to map the workitem application with the actual data file in the file system. (para. 0218). This file identifier represents the address of data. This is not the same as a unique address which identifies a session between the service provider and the remote platform, as required by claim 11.

As such, Applicants respectfully submit that both Cloud and Kim fail to teach or suggest that the step of making a call to start a session further comprises creating a unique address which identifies the session between the service provider and the remote platform, as required by claim 11. For at least this reason, Applicants respectfully submit that that the embodiment defined in

claim 11 is neither anticipated by nor obvious in view of Cloud or Kim, taken alone or in combination, and respectfully request reconsideration of the claim.

#### **IV. Claim 17**

Independent claim 17 is directed to an apparatus that includes a client that performs similar features to those discussed above with reference to claim 1. For similar reasons to those discussed above with regards to claim 1, Applicants respectfully assert that Kim fails to teach or suggest that the procedural part can specify additional steps that must be completed after the procedural part completes before a particular task is considered to have completed, as required by claim 17. Thus, Applicants respectfully submit that the embodiment defined by claim 17 is likewise neither anticipated by, nor obvious in view of Cloud or Kim, taken alone or in combination, and respectfully request reconsideration of the claim.

#### **V. Claim 27**

Independent claim 27 has been amended in a similar manner as claim 11 to more clearly define the embodiment therein. As amended, claim 27 is directed to an apparatus that includes a service provider that performs similar features to those discussed above with reference to claim 11. For similar reasons to those discussed above with reference to claim 11, Applicants respectfully assert that Cloud and Kim fail to teach or suggest that the step of making a call to start a session further comprises creating a unique address which identifies the session between the service provider and the remote platform, as required by claim 27. Thus, Applicants respectfully submit that the embodiment defined by claim 27 is likewise neither anticipated by, nor obvious in view of Cloud or Kim, taken alone or in combination, and respectfully request reconsideration of the claim.

#### **VI. Dependent Claims**

Claims 4-7, 13, 20-23, 28, and 36-39 are not addressed separately, but it is respectfully submitted that these claims are allowable for at least the reason that these claims depend from allowable claims discussed above. It is also submitted that each of these claims also add their own limitation which render them patentable in their own right. Applicants respectfully reserve the right to argue these limitations should it become necessary in the future.

## **VII. Conclusion**

In light of the above, it is respectfully requested that all of the claims now pending in the subject patent application should be allowable, and a Notice of Allowance is respectfully requested. The Examiner is respectfully requested to telephone the undersigned if she can assist in any way in expediting issuance of a patent.

No fee is believed due in connection with this paper. However, the Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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